

<p>Page 97</p> <p>1 MR. LAWSON: It will not be 2 rejected back to the CLEC for handling. 3 MR. SRINIVASA: That's May 2000? 4 MS. LAWSON: Yes. I was trying to 5 think what year it was. 6 MS. LaVALLE: Will it be picked up 7 in PM 13 on a flow-through basis to show that 8 the order is falling out to manual intervention? 9 MS. NELSON: Is Mr. Dysart here? 10 MR. DYSART: I was hiding. 11 MS. MURRAY: It's hard to hide in 12 the front row. 13 MR. DYSART: Well, I was going to 14 move back there. 15 MS. MURRAY: He's already moved 16 one seat down from me. 17 MR. DYSART: This is Randy Dysart 18 with Southwestern Bell. 19 Pending verification of this, if it 20 falls out for manual handling by an LSC 21 representative, then it would be shown as non- 22 flow-through in PM 13. 23 MS. NELSON: Okay. Hold on a 24 second. 25 MR. SRINIVASA: Well, if a firm</p>	<p>Page 99</p> <p>1 you: If an order is electronically generated 2 and it falls out and if there is an error and 3 you send the reject back with the appropriate 4 identification of the reject code, either 5 manually or through the graphical user interface, 6 that performance is captured in PM 10.1. Is 7 that correct? 8 MS. LaVALLE: Right, and in PM 9 9 because it's part of the reject total. 10 MS. NELSON: We keep having this 11 problem in these workshops. Could we have 12 subject matter experts answer questions and 13 not -- or we're going to start swearing in 14 attorneys. 15 MR. SRINIVASA: Randy, PM 10.1, so 16 if an order is electronically generated, if it 17 falls out and if you find that there is a 18 problem with the LSR that was sent out, it was 19 not MOGable, for some reason it falls out and 20 you send the reject notification back, either 21 through graphical -- the GUI interface or via 22 facsimile, however you send it back, defined in 23 the reject code, the performance associated with 24 that is captured in PM 10.1. Is that correct? 25 MR. DYSART: This is Randy Dysart.</p>
<p>Page 98</p> <p>1 order confirmation has already been sent -- 2 okay? -- later in the back-end systems, you find 3 there is a problem and you sent a reject back, 4 like a jeopardy notice back, it shows it as a 5 flow-through anyway. Right? 6 MR. DYSART: Let me clarify. Is 7 this situation where it's falling out before FOC 8 or after FOC? If it falls out before FOC, then 9 it will impact PM 13; if it falls out after FOC 10 and the order has been distributed, then it 11 won't affect PM 13. 12 MS. LaVALLE: And we can get to 13 that. I know we'll have that discussion later 14 on when we get into what AT&amp;T is proposing for 15 13.1, but that's a concern in terms of trying to 16 measure the amount of manual intervention. The 17 manual intervention is there whether it happens 18 before FOC or after FOC. 19 So we want to make sure that since a 20 CLEC won't get notification if there's been this 21 mismatch, that somehow the data will be 22 capturing what the occurrence is so that we'll 23 know from a workforce scalability issue that the 24 problem is being managed. 25 MR. SRINIVASA: Well, let me ask</p>	<p>Page 100</p> <p>1 That's correct. 2 MS. NELSON: Okay. 3 MS. CHAMBERS: But, actually, in 4 this instance we would not receive a reject back, 5 so it would not be captured in either of those 6 measures. 7 MR. SRINIVASA: You mean they 8 would correct the LSR and submit it through, and 9 you do not want them to do that, you had 10 rather -- 11 MS. CHAMBERS: No -- well, I would 12 argue that we shouldn't receive an address 13 reject when we haven't submitted an address. 14 It's their problem. It's a database 15 inconsistency, but it's still reflective of what 16 is happening to our orders and the manual 17 handling that is occurring at the LSC. 18 MS. NELSON: Isn't it happening to 19 your orders because you're using their database? 20 I mean, doesn't it also affect them in terms of 21 incorrect addresses? 22 MS. CHAMBERS: Not in the same way 23 in that CLECs are doing conversion orders, and 24 that's what we're talking about today. 25 MS. NELSON: Okay. Go ahead, Mr.</p>

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1 Dysart.  
2 MR. DYSART: This is Randy Dysart,  
3 Southwestern Bell.  
4 If we choose not to reject it back or  
5 send a jeopardy back -- if, for example, it's  
6 done before FOC and holds up for manual  
7 handling, that will be reflected in the  
8 flow-through measurement.  
9 If for some reason it's after FOC and  
10 it's been distributed, then it follows the same  
11 process that our orders would follow. We're  
12 correcting it. It has no impact on you as a  
13 CLEC. Your customer is going to get the service  
14 on that due date. We're not asking you for  
15 additional input. We're recognizing it's a  
16 database error, and we're correcting that  
17 database error.  
18 So in that sense, it has no impact on  
19 your order that you would even need to be aware  
20 of since we're actually fixing and correcting  
21 the database problem. And if for some reason  
22 there is a problem down the line in  
23 provisioning, we would pick up one of the other  
24 provisioning measurements.  
25 MS. HALL: This is Lori Hall with

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1 AT&T.  
2 Would it affect posting?  
3 MS. LAWSON: It shouldn't delay  
4 it -- this is Beth Lawson with Southwestern  
5 Bell.  
6 MS. CHAMBERS: I think, you know,  
7 a mismatch in address, I mean, that's activity  
8 required by the LSC to correct before the order  
9 could post -- I mean the service orders. At  
10 least today, if there's -- we've experienced  
11 those problems where there's, you know, address  
12 inconsistencies on the service orders, and that  
13 results in a delay in posting.  
14 MS. LAWSON: Well, I think we  
15 would have to get more specific -- again, this  
16 is Beth Lawson with Southwestern Bell.  
17 When you look at PREMIS, it doesn't  
18 contain also the LOC information. So when you  
19 get into things not being available in a  
20 address, there's a lot of different things that  
21 aren't taken into account when you get down to  
22 provisioning.  
23 And if there is an address situation,  
24 it will show up provisioning. It would get  
25 corrected before you got to billing. So it's

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1 not a posting issue at all; it would get  
2 validated during the provisioning.  
3 MR. SRINIVASA: I need to get an  
4 understanding again. Mr. Dysart, the business  
5 rule for PM 13 reads,  
6 "The number of orders that flow through  
7 SWBT's ordering system and are distributed in  
8 SORD without manual intervention . . ."  
9 That means if it is not MOGable, it  
10 fell out, and you corrected the order and you  
11 sent it through, that's not counted as a  
12 successful flow-through according to this  
13 business rule.  
14 MR. DYSART: That's correct; it's  
15 not.  
16 MR. SRINIVASA: Is that AT&T's  
17 understanding?  
18 MS. HALL: This is Lori Hall with  
19 AT&T.  
20 It was our understanding that if an  
21 order from the get-go is not MOGable, it wasn't  
22 counted in PM 13.  
23 MR. SRINIVASA: If you look at the  
24 business rule, PM Version 1.6, it reads as  
25 follows:

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1 "The number of orders that flow through  
2 SWBT's ordering systems and are distributed in  
3 SORD without manual intervention, divided by the  
4 total number of MOG Eligible orders and orders  
5 that would flow through EASE within the  
6 reporting period."  
7 MR. COWLISHAW: Pat Cowlshaw for  
8 AT&T.  
9 And the first part of that phrase  
10 speaks to what Ms. Hall just said, which is with  
11 only MOG-eligible orders get into PM 13 in the  
12 first place as part of the denominator or the  
13 numerator, with the caveat that orders that  
14 would flow through EASE as of October 1st, which  
15 is the last time I'm aware of this being  
16 discussed as a matter of record in any of these  
17 proceedings, Southwestern Bell was in the  
18 process of determining whether or how it would  
19 be able to implement that latter part of the  
20 business rule, the orders that would flow  
21 through EASE.  
22 And to my knowledge -- that's the last  
23 discussion I've heard on that subject, and  
24 certainly there's been no validation of the  
25 implementation of that. I don't know what the

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1 current status is of any implementation of  
2 orders that are not MOG-eligible but, quote,  
3 would flow through EASE, even being captured in  
4 PM 13.  
5 MS. NELSON: Mr. Dysart, do you  
6 want to respond?  
7 MR. DYSART: Yes. This is Randy  
8 Dysart, Southwestern Bell.  
9 In November, we began putting in the  
10 denominator outside record and move orders --  
11 outside move and record orders; I got that  
12 backwards -- which do flow through EASE but were  
13 not MOG-eligible, and that's the majority of the  
14 differences.  
15 MS. KETTLER: Could you repeat  
16 that again, Randy, please.  
17 MR. DYSART: I don't know if I  
18 can.  
19 Randy Dysart, Southwestern Bell.  
20 In November, we began including in the  
21 denominator outside move and record orders in PM  
22 13.  
23 MR. SRINIVASA: That's --  
24 MS. NELSON: Okay.  
25 MR. SRINIVASA: Now, I had

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1 something similar to that, Mr. Dysart. PM 9.  
2 how is it calculated, electronic orders and  
3 electronic rejects?  
4 MR. DYSART: That's correct. It's  
5 any -- this is Randy Dysart, Southwestern Bell.  
6 It's any electronic reject, and it also  
7 includes -- and I can't remember the exact  
8 date -- but it includes anything sent back via  
9 LASR GUI.  
10 MR. LAWSON: And LASR GUI.  
11 MR. DYSART: So, in other words,  
12 anything submitted electronically and sent back  
13 either via LASR or LASR GUI.  
14 MR. COWLISHAW: This is Pat  
15 Cowlshaw for AT&T.  
16 I think the latter part of that,  
17 inclusion of the LASR GUI rejects, was about  
18 October time frame?  
19 MR. DYSART: I believe -- you  
20 know, pending checking, I believe you're  
21 correct. October is about the right time frame.  
22 MR. SRINIVASA: PM 9, apparently  
23 this issue about jeopardy, something that was  
24 FOC'd and later on it was rejected, you haven't  
25 changed any calculation since then, even though

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1 there was a process change? Calculations are  
2 still the same, you haven't changed any there.  
3 Right?  
4 MR. DYSART: This is Randy Dysart  
5 with Southwestern Bell.  
6 No, the calculations would be the same.  
7 It's whatever was rejected back, divided by the  
8 total number of LSCs.  
9 Now, effective in January -- prior to  
10 that, some of those rejects that are now  
11 jeopardies probably would have been included in  
12 that. But currently with the new process, they  
13 aren't there.  
14 MR. SRINIVASA: From January  
15 onwards, you are no longer counting those as  
16 rejects?  
17 MR. DYSART: Well, they come back  
18 at jeopardies, so they're not actually a reject  
19 because typically you're going to reject an LSR.  
20 not reject an order. And in our October 1st  
21 meeting with AT&T, we had agreed to --  
22 MR. SRINIVASA: Where is it in the  
23 business rule? Can you show me? Was that  
24 approved by the Commission in the business rule?  
25 MR. DYSART: Well, I think the

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1 business rule didn't change. It was a matter of  
2 how the process in the LSC was changed. The  
3 process prior to January 15th, or whatever date  
4 it was, was to send back a reject on some of  
5 these situations that had already received a  
6 FOC.  
7 And as AT&T pointed out in October,  
8 probably the better way to handle that would  
9 have been to jeopardy. So effective in  
10 January -- the measurements stayed the same  
11 because we didn't reject it, we just sent the  
12 jeopardy back.  
13 MR. SRINIVASA: If you read the  
14 business rule -- let me read that. It states as  
15 follows, PM 9:  
16 "A reject is anything that is received  
17 via LEX or EDI that does not pass LASR edit  
18 checks or other edits prior to the order being  
19 distributed and is returned electronically to  
20 the CLEC."  
21 MR. DYSART: Yes.  
22 MR. SRINIVASA: This being the  
23 definition, to the extent that it passed LASR,  
24 it was not a reject. Subsequently, there was a  
25 jeopardy notice issue. So you have always been

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1 consistently reporting the reject rates  
2 following this business rule. Is that correct?  
3 MR. DYSART: We have been  
4 reporting a reject. I would have to clarify  
5 whether or not prior to January some of those  
6 that have actually been FOC'd were included in  
7 the measurement or not. I can't say for sure  
8 whether they were.  
9 MR. SRINIVASA: But if it did not  
10 pass LASR, only then it was counted as a reject?  
11 Apparently it passed LASR, it wasn't counted.  
12 MS. KETTLER: Could I comment,  
13 because I think we might be missing two little  
14 idiosyncrasies here. We're talking SORD  
15 distribution versus FOC notification. I for one  
16 had assumed that FOC was provided back after the  
17 order had been distributed, created and  
18 distributed in SORD.  
19 I think part of the problem we're all  
20 experiencing in trying to get a handle on is the  
21 fact that a FOC will be provided before that  
22 point in time, particularly for manually  
23 processed orders.  
24 So there's some technical gray areas  
25 that I think that you're attempting to address

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1 or get definition on. And I for one would not  
2 feel comfortable with any blanket answers in  
3 that based on our very preliminary analysis of  
4 some of the source data we've seen.  
5 MR. COWLISHAW: Pat Cowlshaw for  
6 AT&T. You're raising a question, I think, of  
7 whether it's, in fact, technically consistent  
8 with the precise reading of the business rule.  
9 But I think the discussion Randy and I  
10 had a minute ago confirms what's in the data  
11 anyway, which is as of -- and I think it's  
12 October 1999 -- the rejects that are captured in  
13 10.1, the manual rejects on electronic orders  
14 were included in the data in the totals of  
15 rejects in PM 9, even though those 10.1 rejects  
16 are post-LASR.  
17 MR. DYSART: Well -- this is Randy  
18 Dysart, Southwestern Bell.  
19 I think we had this discussion in an  
20 open meeting, and we agreed to do that. Now,  
21 granted, the business rule talks about only  
22 those electronically submitted through LASR, but  
23 it was our understanding that everybody -- that  
24 was something everybody wanted to do. It wasn't  
25 like we're -- typically since the reject rate,

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1 you know, we're increasing our reject rate, so I  
2 don't know if that's the question. But I  
3 thought your question actually addressed after  
4 FOC.  
5 MR. SRINIVASA: Right. What I'm  
6 trying to show is, I heard that rejects rates  
7 were high and the reason why it is dropping is  
8 because some of the things are not captured in  
9 here. If you were following the same business  
10 rule, how is that possible?  
11 MS. KETTLER: If I might comment  
12 and clarify a little bit further? It's a  
13 process issue. One of the reasons they elected  
14 to return jeopardies after FOC is because there  
15 were so many problems happening after FOC. The  
16 REPs were returning FOCs early so that they were  
17 within the five-hour time frame and then would  
18 process the order to find problems and then  
19 would reject it.  
20 After 1/15, they were no longer  
21 allowed to do that, and the process was changed.  
22 So if they had already FOC'd us, regardless of  
23 what had happened with the order in SORD, it  
24 could not even be in SORD, and we could receive  
25 a FOC.

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1 And then they started to process the  
2 order and they found a problem, they would  
3 jeopardy it. And we found that a lot of the  
4 initial problems we were having were just that,  
5 and the reason why we had the substantial  
6 reduction in --  
7 MR. SRINIVASA: Right. We do not  
8 have a PM for jeopardy. That's --  
9 MR. DYSART: This is Randy Dysart,  
10 Southwestern Bell.  
11 That's really not the issue. We are  
12 not returning FOCs prematurely before it's  
13 distributed to SORD. That wasn't what changed  
14 on January 15th.  
15 What changed on January 15th was, after  
16 the order had been distributed in SORD, there  
17 was one of these errors that you guys have been  
18 talking about that happened. And at that point,  
19 instead of sending a jeopardy back, we actually  
20 sent a reject back, and so it rejected the LSR.  
21 the order, after it had already been FOC'd.  
22 It wasn't a matter of it hadn't been  
23 distributed yet; it had been distributed. So  
24 the process that changed in January was that we  
25 sent the jeopardy back which, to answer your

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1 previous question, when we were prior to January  
2 having a reject, it was being picked up in here  
3 because LASR -- as of October because as of  
4 October, this measurement was actually  
5 incorporating LASR GUI rejects as well as LASR  
6 rejects. So then when that process stopped in  
7 January, then those are no longer being counted  
8 in this PM.  
9 MR. SRINTVASA: How about in  
10 November and December?  
11 MR. DYSART: They included  
12 anything that was being rejected back after FOC  
13 because that was done via LASR GUI and that was  
14 one of the pieces that were picked up.  
15 MS. CHAMBERS: Julie Chambers with  
16 AT&T.  
17 I mean, the intent of this measure was  
18 to try to get a picture at the total rejects, so  
19 that's why the decision was made back in  
20 October, or the agreement that the measure would  
21 reflect, you know, the broader picture,  
22 inclusive of LASR GUI rejects. And that's then  
23 why you would see a decline in the reject  
24 measure as of January, because a percentage of  
25 those are now received as jeopardies.

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1 MR. SRINTVASA: Do you agree with  
2 that statement?  
3 MR. DYSART: This is Randy Dysart  
4  
5 I can't say why it's decreased or not,  
6 but what she says is true. As of January 15th,  
7 the process -- we're not rejecting and we're  
8 sending jeopardies, so those are not included in  
9 there anymore, and they were prior to January.  
10 I don't know the quantities of jeopardies we're  
11 talking about so --  
12 MS. NELSON: Right. AT&T is  
13 stating that the decline is -- solely  
14 attributable to that? Do you have the data to  
15 support that? That would be my question.  
16 MS. MURRAY: I think we do have  
17 some data.  
18 MS. CHAMBERS: I could look into  
19 the specifics, Donna. I mean, I know that it  
20 definitely is a -- it's a factor.  
21 MS. LAWSON: And, Ms. Nelson,  
22 regarding PM 9, I mean, if you look at the  
23 percentage difference for AT&T between January  
24 and February, there's not that much of a  
25 percentage difference, and the volume doubled of

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1 LSRs.  
2 MR. SRINTVASA: When the reported  
3 data for PM 9, what's on the Web site -- is it  
4 26.3 percent in January and 22.1 percent in  
5 February?  
6 MS. LaVALLE: We were just  
7 requesting that CLEC-specific data not be  
8 addressed in the open record.  
9 MR. SRINTVASA: This is all CLECs?  
10 MS. LaVALLE: We have no objection  
11 to all CLEC data being discussed in the record.  
12 MS. LAWSON: For PM 9 for EDI.  
13 that's all CLEC data. Just for clarity, that's  
14 all CLEC data; it's not carrier-specific.  
15 MS. LAWSON: Right. It's 22.1.  
16 And in January, it was 26.3.  
17 MS. LaVALLE: And if this helps,  
18 for the combined LEX EDI reject for all CLECs  
19 for January, Southwestern Bell reported 34.2  
20 percent were rejects, so that would be for PM 9.  
21 MR. SRINTVASA: Including EDI and  
22 LEX?  
23 MS. LaVALLE: Yes, sir.  
24 MS. NELSON: Right.  
25 MR. SRINTVASA: So the 26.3 and

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1 22.1 is EDI-specific. Is that correct?  
2 MS. LAWSON: That's correct.  
3 MS. NELSON: Okay. We're going to  
4 take a lunch break right now. And when we come  
5 back, we're going to start discussing the new  
6 proposed performance measures that have been  
7 distributed out, at least as to 9, 10, and 11,  
8 and 13 perhaps.  
9 And if people could be back here by  
10 1:15.  
11 MS. BOURIANOFF: Ms. Nelson?  
12 MS. NELSON: Yes?  
13 MS. BOURIANOFF: I know we have a  
14 conference call on hot cut issues. And I was  
15 wondering, given that many of the parties  
16 participating in that call will not be present  
17 in the room, if Southwestern Bell had any  
18 further proposal regarding the hot cut measures?  
19 Do they have it available now so we can get it  
20 to those who have to call in and prior to that  
21 3 o'clock call?  
22 MS. MURRAY: We don't have it with  
23 us, but we can have it when you come back after  
24 lunch, which should be enough time.  
25 MS. NELSON: Okay.

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1 MS. MURRAY: May I put one other  
2 thing on the record, too?  
3 MS. NELSON: Yes.  
4 MS. MURRAY: Before we went off  
5 the record on our break, I believe I said  
6 something to the effect that we didn't have all  
7 the SMEs here today to address the jeopardy  
8 issue. As everybody promptly told me as soon as  
9 we got off the record, "Yes, we did have the  
10 SMEs here."  
11 So I want to make sure that the record  
12 is clear, that when we had our off-the-record  
13 discussion with AT&T, we did have the people  
14 here who were sufficiently knowledgeable to  
15 address the issues and that those were the  
16 people that participated in that discussion.  
17 MS. NELSON: Okay. Thank you.  
18 MS. HARTLINE: I was just  
19 wondering if Southwestern Bell has their  
20 proposal for the specific performance  
21 measurement that we'll be talking about after  
22 lunch?  
23 MS. MURRAY: You mean the OSS  
24 ones?  
25 MS. NELSON: Those have been

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1 distributed already.  
2 MS. MURRAY: We can get you a copy  
3 of that. We've got it.  
4 MS. HARTLINE: Thank you.  
5 MS. NELSON: Thanks. Let's go off  
6 the record.  
7 (Lunch recess: 12:02 p.m. to  
8 1:20 p.m.)  
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1 AFTERNOON SESSION  
2 MONDAY, APRIL 17, 2000  
3 (1:20 p.m.)  
4 MS. NELSON: Okay. Let's go ahead  
5 and go back on the record. This afternoon we're  
6 going to review the suggestions for performance  
7 measure changes for 9, 10, 11 and 13. I should  
8 say 9, 10.1, 11, 11.1 and 13.  
9 I'd like to start out with having  
10 Southwestern Bell explain the revisions that are  
11 being proposed by Southwestern Bell, and then  
12 we'll go to the other parties who similarly have  
13 revisions, and, again, please identify  
14 yourselves. As you see -- we have a new court  
15 reporter, as you can see, although I think she  
16 knows many of you in the room.  
17 MR. DYSART: This is Randy Dysart,  
18 Southwestern Bell. Starting with PM No. 9, ours  
19 was just simply a clarification in making sure  
20 that we referenced an LSR in the business rule  
21 versus a reject, if anything, instead of a  
22 reject as an LSR, and we would propose to leave  
23 it diagnostic.  
24 MR. SRINIVASA: When you say  
25 "other edits," what do you mean by "other

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1 edits"?  
2 MR. DYSART: In the business rule.  
3 MR. SRINIVASA: Oh, it is in the  
4 current version, right, or other edits?  
5 MR. DYSART: Well, I think what  
6 we're trying to reference here would be the LASR  
7 GUI, and maybe we need to be more specific about  
8 that, but it could either be done via -- as we  
9 discussed earlier, it could be done with a  
10 normal -- through LASR electronically, or if it  
11 falls out prior to distribution and it's  
12 returned electronically, via LASR GUI, we would  
13 want to capture that in this also. I think  
14 that's what's we're trying to say here. It  
15 probably needs to be spelled out a little bit  
16 better and particularly reference LASR GUI.  
17 MS. NELSON: Okay. Do other  
18 parties have proposed changes to PM 9? I see  
19 that.  
20 MS. HALL: This is Lori Hall with  
21 AT&T.  
22 MS. NELSON: Could you come and  
23 sit in the front since you've been speaking  
24 quite often? That wasn't an insult, by the way.  
25 MS. HALL: I just had a

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1 clarification on here. Here in the business  
2 rules it says that a reject is an LSR.  
3 Shouldn't it rather be a reject is a  
4 notification on an LSR?  
5 MR. DYSART: This is Randy Dysart.  
6 That's a good clarification. Thank you.  
7 MS. NELSON: Okay.  
8 MS. EMCH: This is Marsha Emch  
9 with MCI WorldCom. If I could have a point of  
10 clarification? The business rules also have in  
11 it "prior to the order being distributed." Can  
12 I just get clarification? I thought I heard  
13 this morning that FOCs are always given out  
14 prior to being distributed. Is that correct?  
15 Is there any -- well, first, is that a  
16 correct --  
17 MR. DYSART: This is Randy Dysart.  
18 No, that's not correct. The FOC is sent after  
19 the order has been distributed in SORD.  
20 MS. EMCH: The FOC is sent after  
21 the order has been distributed.  
22 MR. DYSART: Right, that generates  
23 the FOC.  
24 MS. EMCH: I guess my confusion  
25 is -- I thought I heard this morning from either

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1 AT&T or Birch the cases where the FOC is being  
2 given after the distribution in SORD, the due  
3 date is being rejected, and then that is or is  
4 not included in this measure, or am I confusing  
5 issues? I just need clarification on that.  
6 MR. DYSART: This is Randy Dysart.  
7 I believe -- it was brought up I believe by  
8 Birch, but I think that was a representation of  
9 how she thought the process worked. In reality,  
10 we do not send out a FOC prior to the order  
11 being distributed in SORD.  
12 MS. KETTLER: As a matter of  
13 clarification --  
14 MS. NELSON: Could you identify  
15 yourself, please?  
16 MS. KETTLER: I'm sorry, yes.  
17 Thank you. Patti Kettler with Birch Telecom.  
18 We had brought numerous problematic examples of  
19 orders that had been processed by Bell and ended  
20 up being problematic. One of the explanations  
21 had been due to this problem where the FOC was  
22 returned early. The agent processed the order,  
23 found some problems, rejected it. We thought it  
24 had been FOC'd, wasn't aware of it. Part of the  
25 explanation we were given for jeopardy is so

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1 that it's very clear that if something happens  
2 post-FOC, the way you'll find out about it is  
3 via jeopardy, and it was a clear line.  
4 So I would, I guess, recommend that for  
5 clarity, and I think that's what -- actually  
6 what Randy said earlier is rather than SORD  
7 distribution, it should be prior to FOC because  
8 that's clearly now, when you look at jeopardies,  
9 the delineating factor.  
10 MS. NELSON: So you would say, "or  
11 other edits prior to" --  
12 MS. KETTLER: The order being  
13 FOC'd or returned of firm order confirmation.  
14 MS. NELSON: Right, prior to the  
15 return of or receipt of? The return of?  
16 MS. KETTLER: Return --  
17 MR. DYSART: This is Randy Dysart.  
18 From our standpoint, it's the same thing. So we  
19 could agree to that language.  
20 MS. NELSON: So prior to the  
21 return of a firm order?  
22 MR. DYSART: Confirmation.  
23 MS. LaVALLE: Kathleen LaValle for  
24 AT&T. If we can just be sure, it would still  
25 include all of those rejects that are now coming

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1 back over the LASR GUI?  
2 MR. DYSART: Yes, ma'am.  
3 MS. LaVALLE: Because another way  
4 to do it would just be to take out the reference  
5 to FOC and just say any rejects coming back  
6 electronically, weather over the LASR GUI or via  
7 LASR MOG, that might be a compromise to solve  
8 the definition issue.  
9 MR. DYSART: This is Randy Dysart.  
10 I'm fine with that also.  
11 MS. NELSON: Okay. So what is the  
12 current language now?  
13 MR. SRINIVASA: Prior to the  
14 return of firm order confirmation, send  
15 electronically.  
16 MS. LaVALLE: I would just remove  
17 the reference since it seems to be causing some  
18 definition in timing and just say that it does  
19 not pass LASR edit checks or other downstream  
20 edits and is returned electronically to the  
21 CLEC.  
22 MR. DYSART: This is Randy Dysart.  
23 We would just have to clarify that it's a reject  
24 and not --  
25 UNIDENTIFIED SPEAKER: Jeopardy.

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1 MR. DYSART: -- a jeopardy. I'm  
2 sorry. Thanks.  
3 MS. LaVALLE: Right, and we'd make  
4 the same point. I think you're exactly right,  
5 that this is a reject notification, and we  
6 proposed measures for jeopardies.  
7 MR. DYSART: Okay.  
8 MS. EMCH: This is Marsha Emch  
9 with MCI WorldCom. Randy, can you just clarify  
10 the difference between a reject and a jeopardy?  
11 What are two definitions of both of those?  
12 MR. DYSART: This is Randy Dysart,  
13 Southwestern Bell. A reject is when we return  
14 an LSR back to the CLEC prior to, in this case,  
15 the FOC or SORD distribution, prior to the FOC.  
16 A jeopardy would be a return for -- it could be  
17 returned for various things. You may get a  
18 situation where you have lack of facilities. So  
19 we're going to send you back a jeopardy saying  
20 that we have a CS situation, or in the case we  
21 talked about this morning, we need more  
22 information to process the order. There was an  
23 error in the address, you know, you type in 802,  
24 and it should have been 803. That information  
25 then would come back in a jeopardy, and it's

1 errors in the LASR, it was not cut like the  
2 address, 802 versus 803, Suite 10 versus Suite 9  
3 or whatever it is, then you found that out.  
4 When you dispatched somebody, there was a  
5 problem, that's not the address. Then is that a  
6 jeopardy situation, or is it something that was  
7 started with an error?  
8 MR. NOLAND: I'm sorry. What I  
9 was trying to say earlier -- the jeopardy  
10 notification codes and reason codes are included  
11 in the LSOR. Maybe I confused the issue.  
12 MR. DYSART: This is Randy Dysart.  
13 Let me see if I can tackle your question here.  
14 It would be an error, but since the FOC has  
15 already been issued and it's something in the  
16 provisioning piece of it, it's more information  
17 that we need clarification from the CLEC that it  
18 really and truly was Suite 8 instead of Suite 9  
19 or whatever that may be. So we would have to  
20 send a jeopardy back to say, "We need some piece  
21 of information." In that case, it's a jeopardy  
22 because you can't reject the LSR since it's  
23 already been distributed.  
24 MR. SRINTVASA: So what is the  
25 action that you -- they need to supplement the

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1 after the FOC has been sent back.  
2 MS. EMCH: Yes, I'm only -- this  
3 is Marsha Emch with MCI WorldCom. I was only  
4 familiar with jeopardies due to facilities or  
5 workload issues. I wasn't aware there were  
6 possible other issues, as you just mentioned,  
7 about the incomplete data or something like  
8 that. I thought that would automatically be a  
9 reject and not a jeopardy. So I'm just --  
10 Southwestern Bell jeopardy.  
11 MR. NOLAND: This is Brian Noland  
12 with Southwestern Bell. The jeopardy  
13 notifications are contained in the LSOR, and  
14 there are several others, end user not ready, no  
15 access to end-user PREMIS, those sorts of  
16 things. So it's not just the address and the  
17 lack of facilities that we mentioned. There are  
18 several others that are included in that  
19 complete list, which is included in the LSOR.  
20 MR. SRINTVASA: Well, if it is  
21 incorrect information on the LSR, if it was  
22 post-FOC, how could there be a jeopardy?  
23 MR. NOLAND: In what exact --  
24 MR. SRINTVASA: If the LSR was  
25 filled out incorrectly, you did not have any

1 LSR again, they have to have a related PON or  
2 they --  
3 MR. NOLAND: Yes, sir. The  
4 example I used this morning was when the  
5 technician got out in the field and determined  
6 that the address that was on the order was not  
7 the correct address, and then he in turn  
8 notifies the LSC, who at that point in time  
9 would send through the jeopardy notification  
10 back to the CLEC so that additional information  
11 could be obtained in order to provision the  
12 service.  
13 MR. SRINTVASA: So the due date  
14 and everything changes from that point on?  
15 MR. NOLAND: Yes, sir, the due  
16 date would change at that point on.  
17 MR. SRINTVASA: Again, you send  
18 another firm order confirmation back to them for  
19 that due date.  
20 MR. NOLAND: Yes. Yes, sir, with  
21 the address change on the LSR, there would be  
22 another firm order confirmation that would be  
23 sent after the additional information is  
24 obtained.  
25 MR. WILLARD: This is Walt Willard



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1 with AT&T, which is one of the -- it really  
2 drives to the point of moving those edits up  
3 front.  
4 MR. SRINIVASA: Yes, that's right.  
5 Well --  
6 MS. EGGEN: This is Mary Ann  
7 Eggen, Southwestern Bell. I think we've kind of  
8 muddled it up a little bit, and just as a point  
9 of clarification, I believe back in October the  
10 CLEC community felt some confusion in receiving  
11 a FOC and then reviewing a reject after FOC. So  
12 at that point in time, the jeopardy process was  
13 agreed upon, and beginning in January, the  
14 jeopardy process was put into place.  
15 If a jeopardy is found where a due date  
16 change needs to take place, a new due date  
17 should -- the process is that the new due date  
18 should be given on the jeopardy. Once the CLEC  
19 submits a supplement to that original LSR, at  
20 that point in time, a new FOC will be given on  
21 the new due date or the new LSR -- or the  
22 supplement.  
23 MR. SRINIVASA: How often does  
24 that happen? That's where you find -- you are  
25 collecting data on how many jeopardy notices

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1 have been sent. Right? Every time there's a  
2 jeopardy notice sent, there's going to be a due  
3 date change and another FOC on that same order.  
4 MR. DYSART: This is Randy Dysart.  
5 Not every time. If there's lack of facilities  
6 or issues like that, we're notifying the CLEC  
7 that there's a problem and we can't meet the due  
8 date, the due date won't change on those. For  
9 situations like this where -- you know, I think  
10 they said in PREMIS you validate a range of  
11 addresses, like on this street, you can have  
12 Address 1 through 20. If they would type in 3  
13 and it's not the valid address, then that might  
14 fall out. In that case, there will be  
15 supplements. We don't have the data on hand at  
16 the moment, but we're trying to get that.  
17 MR. SRINIVASA: When they  
18 supplement those orders, they don't flow  
19 through. Again, you have to handle it. Even  
20 though they fill out, say, whatever interface  
21 they have, the EDI, the Internet, it falls out,  
22 and you have to go back -- prior to MOG, it  
23 falls out. Apparently it's not MOGable. The  
24 supplements are. Right?  
25 MR. NOLAND: That is correct.

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1 MS. CHAMBERS: Right. This is  
2 Julie Chambers with AT&T. That is correct.  
3 MS. WEGER: That is Misty Weger  
4 with Southwestern Bell. If the first version  
5 that came through MOG'd, which in general, if  
6 anything we would send a jep back in these  
7 cases. Generally that first LSR MOG'd. When  
8 the second one comes through, it will not MOG.  
9 The service orders are created already. They're  
10 out there in the system just waiting for the  
11 correct information to be put on them, but the  
12 service orders are already there. So, no, they  
13 will not MOG because the service orders are  
14 already created.  
15 MR. SRINIVASA: Let me understand  
16 this. These jeopardy notices could go out  
17 because -- it could have been due to  
18 Southwestern Bell caused problems, such as lack  
19 of facilities -- let's say it was caused by you  
20 or it was because CLECs entered something wrong.  
21 Are you grouping them separately like that? How  
22 do you capture that in the performance data?  
23 MR. DYSART: This is Randy Dysart,  
24 Southwestern Bell. They have separate jep codes  
25 for those, jeopardy codes, that go back

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1 differentiating the different reasons, similar  
2 to reject codes.  
3 MS. CHAMBERS: This is Julie  
4 Chambers with AT&T, and currently -- actually  
5 the jeopardy code, all of these different  
6 reasons are aggregated at one jeopardy code,  
7 which is the 1P jeopardy code. There are a few  
8 others, but, for example, the ones that we're  
9 talking about today for the most part are 1Ps,  
10 and today there is no measure currently that  
11 reports jeopardies.  
12 MS. EGGEN: This is Mary Ann  
13 Eggen. I can answer -- further clarify. We are  
14 not capturing data that determines CLEC cause or  
15 Southwestern Bell cause in measuring that data.  
16 MR. SRINIVASA: Jeopardies.  
17 MS. EGGEN: On jeopardies.  
18 MR. SRINIVASA: So that  
19 performance is not captured in any of the  
20 measures now? Flow through doesn't capture it.  
21 Reject doesn't capture it.  
22 MR. NOLAND: Well, I think we said  
23 earlier that on a no-loop or facilities not  
24 available that that would be captured and  
25 another measurement if the due date was missed.

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1 MR. SRINIVASA: So you do capture  
2 that in Southwestern Bell missed due dates?  
3 MR. NOLAND: Yes, sir.  
4 MR. SRINIVASA: Because there was  
5 an FOC sent already, but you missed the due  
6 date, but if it was due to CLEC-caused error in  
7 filling out the application, you still count  
8 that as Southwestern Bell missed due dates  
9 because you sent a FOC back?  
10 MR. DYSART: This is Randy Dysart.  
11 No.  
12 MR. SRINIVASA: That will be  
13 excluded.  
14 MR. DYSART: Well, the supplement  
15 will come back, and it will go through -- my  
16 understanding is it will go back through the  
17 normal process, and the due date would change,  
18 for a CLEC-caused error.  
19 MS. NELSON: Okay.  
20 MR. NOLAND: There's other reason  
21 codes, no access and those sorts of things, that  
22 could come up during the provisioning process as  
23 well, but driving instructions, if it's a rural  
24 address, we may need additional information. So  
25 it's not just some of the ones we've been

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1 talking about. There's others.  
2 MS. HALL: This is Lori Hall with  
3 AT&T. Just to kind of give you a frame of  
4 reference, for instance, for March, 50 percent  
5 of the jeopardies that AT&T received were  
6 actually what we have referred to as a post-FOC  
7 error.  
8 MS. NELSON: What were the others?  
9 MR. SRINIVASA: Total LSRs that  
10 you sent, how much -- what percentage did you  
11 receive jeopardies on? If there were 100 LSRs  
12 sent, what percent of that did you receive  
13 jeopardy?  
14 MS. HALL: I would have to get  
15 that information. I don't have that in front of  
16 me.  
17 MR. SRINIVASA: Okay.  
18 MS. GENTRY: Jo Gentry, IP  
19 Communications. We're very new to this process.  
20 We've only been probably submitting orders for a  
21 matter of a couple of months, and I'm just  
22 asking for clarification. Since I'm pretty much  
23 in a manual mode, it will be a period of time  
24 before I'm in a mechanized process. Where are  
25 the orders that I'm submitting being captured,

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1 which would be for rejects and for this type of  
2 situation that we've been discussing? I'm  
3 putting through enough quantity. It's just a  
4 matter that I'm not transitioned to an  
5 electronic interface or a mechanized mode. Are  
6 mine being captured in any of these discussions  
7 for reject?  
8 MR. SRINIVASA: There are  
9 manual --  
10 MR. DYSART: This is Randy Dysart,  
11 Southwestern Bell. I guess the question I would  
12 have --  
13 MS. GENTRY: Returns or rejects.  
14 MR. DYSART: -- I would have is,  
15 are you submitting these electronically or --  
16 no.  
17 MS. GENTRY: No, I'm submitting  
18 them manually.  
19 MR. SRINIVASA: It would be a fax?  
20 MS. GENTRY: Uh-huh.  
21 MR. DYSART: The rejects are not  
22 captured in a reject measurement.  
23 MS. GENTRY: I believe that was  
24 why that I know one of the requests for the  
25 modification of this measure was to include the

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1 manual portion for companies that do manual.  
2 MS. NELSON: Okay. We were going  
3 to -- I was going to ask Time Warner, somebody  
4 from Time Warner to go over their suggested  
5 changes to No. 9, PM 9.  
6 MS. MUDGE: Just so you'll know,  
7 that's a Rhythms/Covad proposal. So whenever  
8 you want to talk about DSLs, the DSL proposed  
9 changes to PM 9, I think that would --  
10 MS. NELSON: Okay. I'm talking  
11 about -- is it not correct that Time Warner --  
12 the matrix I have has a change from Time Warner,  
13 and I guess there must not be anybody from Time  
14 Warner here.  
15 MS. HARTLINE: I believe the Time  
16 Warner representative stepped out.  
17 MS. NELSON: Okay. I'll just wait  
18 until -- I saw Rhythms has some, but there's  
19 also some by Time Warner. I was trying to stay  
20 away from DSL measures today since we've just  
21 spent the last two days doing DSL.  
22 MS. MUDGE: And that's fine, but  
23 the DSL carriers have proposed changes to each  
24 of these PMS, and in order to ensure that we did  
25 not -- it wouldn't be considered that we waived

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1 any arguments or any discussion with respect to  
2 our proposal. That's the reason we're here  
3 today, but if it's Your Honors' sense that it's  
4 your preference to take up all proposed changes  
5 other than the DSL proposals, then actually the  
6 experts can go home. So it's really whatever --  
7 it was just our understanding that there was  
8 just general discussion.  
9 MS. NELSON: No, I wasn't  
10 suggesting that we exclude DSL. I just am more  
11 familiar with the DSL proposals since I think we  
12 discussed some of those on Thursday and Friday.  
13 MS. MUDGE: Not with respect to  
14 these performance measures.  
15 MS. NELSON: Okay. But with  
16 respect to disaggregation, we did. Okay. Let's  
17 go ahead and go then to Rhythms' proposed  
18 changes.  
19 MS. LOPEZ: This is Ann Lopez from  
20 Rhythms, and we did go ahead and add in the  
21 manual orders. Part of that is because of the  
22 fact that we still do submit manual orders, a  
23 lot of the data CLECs do submit the manual  
24 orders. That was one change that we had  
25 requested to ensure that they were being

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1 captured in a performance measurement.  
2 We also asked for, in the report  
3 structure, to include Southwestern Bell's  
4 affiliate as well, and we did ask for the level  
5 of disaggregation to include the DSL loops.  
6 MS. NELSON: Okay. Does anybody  
7 have any comments about Rhythms' proposal?  
8 MR. DYSART: This is Randy Dysart,  
9 Southwestern Bell. I think a couple issues --  
10 currently I guess there are still CLECs  
11 submitting LSRs manually. However, I believe  
12 the interface -- we're offering the interfaces  
13 at no charge, I believe. If I'm not correct,  
14 somebody can correct me. So, I mean, it's our  
15 goal and desire to have all these begin to come  
16 in electronically. Therefore, I don't see the  
17 need necessarily to divide it out from manual.  
18 I think that maybe sent the wrong behavior about  
19 submitting orders.  
20 Secondly, as far as disaggregating it,  
21 a reject of an LSR is a reject, regardless of  
22 what it's for, and from an overall aggregate  
23 Texas-type measurement, what's important to  
24 capture is the performance of Southwestern Bell  
25 overall. From the individual CLEC, if they

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1 submit LSRs for DSL, they will get their DSL.  
2 Their measurement will be predominantly DSL or  
3 whatever else they decide to submit as far as an  
4 LSR. So I don't see the need to disaggregate by  
5 DSL by any other order type since the individual  
6 CLEC will determine what's sent in, and they'll  
7 get their individual Tier 1 data at that --  
8 whatever level it is they transmit those LSRs or  
9 whatever service is on those LSRs.  
10 MS. LOPEZ: This is Ann Lopez from  
11 Rhythms, and currently the DSL orders are taken  
12 from a different group than the regular UNE-type  
13 orders, and so we deal with a completely  
14 separate group of people that has been put  
15 together solely for DSL. That's what we need to  
16 capture is the workgroup that we're working  
17 with.  
18 MR. SRINIVASA: Well, you're  
19 saying -- let me understand this. First of all,  
20 in the definition, if you do not include manual  
21 orders, if it was all electronic, then what  
22 you're saying is if DSL companies were sending  
23 orders electronically, if you're capturing the  
24 rejects in this measure, those CLECs that are  
25 exclusively DSL, they're going to get the reject

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1 rates for DSL. That's what you're saying.  
2 Right?  
3 MR. DYSART: Correct.  
4 MR. SRINIVASA: So that's assuming  
5 that the manual orders are not captured in this  
6 measure?  
7 MR. DYSART: My answer would --  
8 if, for example, Rhythms is submitting things  
9 electronically, everything electronic -- I don't  
10 know if they are or aren't, but let's assume for  
11 this example they are, and we don't  
12 disaggregate, then if Rhythms is submitting DSL  
13 orders, any LSRs they submit that we reject,  
14 they will know what they're for because, I mean,  
15 they're submitting a particular order type.  
16 For someone else that does LSRs for UNE  
17 loop and port combinations, they'll know that  
18 predominantly their rejects are on LSRs for UNE  
19 loop and port combinations. The important thing  
20 is not what it's for, but the LSR was rejected.  
21 MR. SRINIVASA: That's true if  
22 they sent the order electronically and you  
23 return the reject electronically, but for DSL, I  
24 don't think it happens that way. I mean, there  
25 are rejects that are sent back -- through GUI

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1 interface, sometimes you send the fax back.  
2 Right?  
3 MS. LOPEZ: That's correct. I'm  
4 sorry. This is Ann Lopez. That is correct.  
5 MS. GENTRY: This is Jo Gentry,  
6 IP. I'd like to just kind of expand on that.  
7 I'm certainly new to the Texas industry as far  
8 as coming in, but I would go on to tell you that  
9 I have as many collocations as a couple of the  
10 large DLECs have combined. So my potential for  
11 order capability in the short-term while I'm  
12 still manual could be significant.  
13 I do believe the essence of having the  
14 manual orders captured is imperative over the  
15 next six to 12 months, and also saying that you  
16 wouldn't capture the manual almost is a negative  
17 or a deterrent for the small companies being  
18 reflected in the measurements. It's not all the  
19 people that have full EDI or full mechanized  
20 capability. I think you need to look at the  
21 universe, and I think the inclusion of manual is  
22 essential along with the inclusion of reflected  
23 data from the subsidiary, and I think -- you  
24 know, we can go on and talk more about the  
25 importance of disaggregation, but it is

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1 imperative to have the manual reflected.  
2 MR. DYSART: Well, let me address  
3 the other point that you brought up. I think  
4 I've addressed the manual, and I really don't  
5 know that I've got any more to add to that, but  
6 as far as the disaggregation by our subsidiary,  
7 really percent rejects is in addition to being  
8 a -- simply the measurement of how many rejects  
9 we return. It's a reflection upon the CLEC.  
10 A lot of the things we've done as far  
11 as edits and everything else, as you heard  
12 today, there's an outcry to move edits up into  
13 the process, and once you do that, you  
14 inherently increase your reject rate because if  
15 you move them up into LASR GUI I mean, that's  
16 what's going to happen. Your reject rate  
17 potentially could increase, and your  
18 flow-through will get better because you're  
19 doing that up-front screening.  
20 As was seen I think in the Bell  
21 Atlantic -- I mean, their reject rate may have  
22 been lower, but their flow-through wasn't as  
23 good. They decided to handle the process  
24 differently. We took the process as we saw it,  
25 from the collaborative process as we stated

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1 today, we wanted -- the CLECs wanted to handle  
2 their own errors, and that's what's been done  
3 here.  
4 So to compare it to ASI I don't know  
5 what the employee base at ASI is compared to  
6 your employee base. There's a lot of different  
7 factors there that go into that. They're  
8 outside of Southwestern Bell's control. We  
9 cannot be held responsible for the accuracy of  
10 an LSR submitted, and comparing it to ASI really  
11 does nothing to talk about Southwestern Bell  
12 Telephone's performance in providing service to  
13 ASI versus a CLEC.  
14 MR. SRINIVASA: See, apparently  
15 percent reject of this measurement does not  
16 capture how long it's going to take for you to  
17 send the rejects. This is just counting -- be  
18 it electronic or manual, if there was a problem  
19 with the form, you're going to reject it. How  
20 many of those --  
21 MR. DYSART: That's correct.  
22 MR. SRINIVASA: So it doesn't  
23 capture the duration?  
24 MR. DYSART: Right.  
25 MR. SRINIVASA: So what you're

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1 saying is if we -- again, it could be a  
2 CLEC-caused error, or it could be a Southwestern  
3 Bell-caused error for rejects, too, not having  
4 an accurate database or something like that.  
5 MR. DYSART: Well, we don't reject  
6 orders for CLEC -- for Southwestern Bell-caused  
7 reasons if it's intentionally -- if it's a  
8 CLEC-caused error -- that we feel is a  
9 CLEC-caused error, we'll reject it. If it's a  
10 Southwestern Bell-caused error, we will correct  
11 that, and it will be picked up in the  
12 flow-through measurement as a nonflow-through if  
13 it's one of the categories that gets included in  
14 there.  
15 MS. LOPEZ: This is Ann Lopez from  
16 Rhythms, and I will say that at Rhythms we've  
17 gone back -- I couldn't even guess how many  
18 times -- because we've gotten a reject that was  
19 a Southwestern Bell error that we had to  
20 escalate and say, "This is part of what we're  
21 allowed to order. You need to do further  
22 training," and this has gone on over and over on  
23 several LSRs, and we get the apologies from  
24 Southwestern Bell saying, "We'll fix this, and  
25 we'll get it straightened out, we'll get the

<p style="text-align: right;">Page 145</p> <p>1 people trained," but we get a lot of rejects 2 that are Southwestern Bell-caused that we have 3 gone back and had to train the service reps to 4 correct and to regain the understanding of 5 whether that -- why that wasn't a good reject. 6 MR. DYSART: This is Randy Dysart, 7 Southwestern Bell, and as I said before, we 8 don't intentionally reject, and I'm not going to 9 sit here and say we've never rejected one that 10 wasn't our problem, but, again, defining a 11 lot -- until I have something specific that I 12 could look at, I can't get into the -- I would 13 need to get examples of that and be happy to 14 take those examples, if you'd give me some of 15 those, that we could look into that, no problem 16 at all but -- 17 MS. LOPEZ: Ann Lopez from 18 Rhythms. Absolutely. I've provided those 19 examples before to Southwestern Bell. 20 MR. SRINIVASA: What percentage of 21 total orders fall into that category, in your 22 experience? 23 MS. LOPEZ: I couldn't give you a 24 percentile offhand. I know that the matrix that 25 we prepared in conjunction with Southwestern</p>	<p style="text-align: right;">Page 147</p> <p>1 manual disaggregated as well. 2 MS. NELSON: Is anybody here from 3 Time Warner? 4 MR. DRUMMOND: This is Eric 5 Drummond on behalf of the CLEC Coalition. Time 6 Warner and the CLEC Coalition don't have a 7 subject matter expert present to discuss the 8 particular issues, but it's clear -- I think the 9 CLEC Coalition would agree with the discussion 10 by Rhythms' subject matter expert, that not only 11 for DSL, but for other carriers, we need this 12 information disaggregated on a manual basis. We 13 need it with most of the PMS that currently 14 capture electronic flow-through to the extent it 15 can reasonably capture it. Although it's 16 manual, it should be included. 17 MS. McCALL: Cindy McCall, MCI 18 WorldCom, and as a matter of record, MCI 19 WorldCom would concur with the rest of the 20 CLECs. 21 MS. CHAMBERS: Actually -- this is 22 July Chambers with AT&amp;T again, and I know one of 23 the issues -- a similar issue was brought up in 24 the CLEC user forum regarding, you know, 25 processes that might not be developed for DSL</p>
<p style="text-align: right;">Page 146</p> <p>1 Bell that was provided to the Commission here 2 had quite a few of those rejects listed out that 3 were Southwestern Bell errors that went back -- 4 and we had to bring those back, you know. 5 MR. SRINIVASA: Do you know a 6 range, you know, what kind of -- in your 7 experience? 8 MS. LOPEZ: I'd hesitate to make a 9 guess at it. I really don't know. 10 MS. NELSON: Let's move on to 11 other -- I think staff has enough information 12 about this proposed change from Rhythms. Let's 13 move on to other carriers' proposed changes to 14 9 -- PM 9. 15 MR. SRINIVASA: Do other carriers 16 agree with the data of the CLECs' proposal to 17 add the manual rejects? 18 MR. WILLARD: We have no 19 disagreement. Walt Willard for AT&amp;T. We don't 20 disagree with it. 21 MR. SRINIVASA: Okay. So 22 including the manual orders that's what -- 23 MS. CHAMBERS: Right. This is 24 Julie Chambers with AT&amp;T. Just as today, it's 25 disaggregated by EDI and LEX. You would want</p>	<p style="text-align: right;">Page 148</p> <p>1 which require perhaps a phone call or a 2 faxed-back reject, and I would think even if it 3 was electronically submitted via LEX or EDI when 4 available, that if it was manually returned, a 5 manually returned reject should also be captured 6 because I think the intent is for CLECs to 7 get -- you know, to learn from the rejects and 8 to really understand, and I think one benefit of 9 having up-front edits is that -- you know, not 10 only do you receive them sooner so you can 11 correct the order in a more expeditious manner, 12 but then you also get more insight into how to 13 build those type edits into your system to try 14 to prevent those edits from occurring. 15 MR. SRINIVASA: Well, this 16 measurement is designated as diagnostic. You 17 know, it just gives you -- it lets the CLECs 18 know what kind of problems there are in the LSR, 19 and it gives you the percentage of that, and I 20 see that Rhythms and Covad have checked in that 21 there should be monetary damages. Where should 22 it be -- you know, it's just for your benefit. 23 Why should there be a monitored damage 24 associated with that? 25 MS. MUDGE: Well, what we've</p>

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1 really done is at this juncture we've reserved  
2 the right to see it based on the diagnostic  
3 information at our next six-month check in.  
4 MR. SRINIVASA: So right now  
5 you're still --  
6 MS. MUDGE: No, sir, we don't have  
7 the information yet, and so I apologize if this  
8 wasn't clear enough, but we want the information  
9 first through levels of disaggregation,  
10 including manual orders, and then in our next  
11 six-month, review based on what we see, it may  
12 be appropriate -- it may not be Performance  
13 Measurement No. 9. It may be appropriate to  
14 create a measurement. We just don't know until  
15 we see that data.  
16 MS. KETTLER: This is Patty  
17 Kettler with Birch, and if I might ask with all  
18 these experts around, with diagnostic measures  
19 in the T2A agreement, do the diagnostic  
20 disaggregated measurements calculate into the K  
21 value?  
22 MR. DYSART: This is Randy Dysart.  
23 No, they don't.  
24 MS. KETTLER: They do not. Thank  
25 you.

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1 MR. DYSART: This is Randy Dysart.  
2 I have one more thing that I would like to get  
3 in there that I didn't bring up, and on levels  
4 of disaggregation, I think currently -- it may  
5 be in the reports. We break it down by EDI and  
6 LEX. I would like to aggregate those total  
7 because really a reject is a measure of LASR,  
8 not a measure of the interface that it goes  
9 into, and if a CLEC uses LEX, they're going to  
10 get their LEX. If they use their EDI, they're  
11 going to get EDI, but as an aggregate Tier 2  
12 type, looking at it on a state-level basis, it  
13 seems to me to make sense to aggregate that at  
14 just total rejects.  
15 MR. WILLARD: Walt Willard with  
16 AT&T, and we would not agree with that proposal.  
17 We maintain that the levels of disaggregation  
18 are very important so that we can go  
19 troubleshoot some of these rejects. We happen  
20 to use EDI as well as LEX. So having an  
21 aggregated measure that said electronic  
22 interfaces X percent reject wouldn't really help  
23 us very much, where today knowing that it came  
24 from LEX we know which community of AT&T users  
25 that we need to go address.

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1 MS. LOPEZ: This is Ann Lopez from  
2 Rhythms. We agree. We're currently  
3 implementing our EDI, and so we go back and  
4 forth between LEX to make sure that it's not an  
5 error that we're causing. So we're going back  
6 and forth between the two still.  
7 MS. NELSON: Does anyone have any  
8 other changes that they're proposing to this  
9 measure?  
10 MR. DYSART: Well, one of my  
11 colleagues corrected me. We currently only  
12 report at an aggregate level. So as the  
13 business rules say, none.  
14 MS. LaVALLE: Randy, I have a copy  
15 if you need it.  
16 MR. DYSART: Okay. I stand  
17 corrected again.  
18 MS. LaVALLE: Kathleen LaValle for  
19 AT&T. I believe Performance Measure 9 is  
20 reported on a disaggregated EDI/LEX basis. I  
21 have a copy of it.  
22 MR. DYSART: Yes, I see it now,  
23 and I go back to my original statement.  
24 (Laughter)  
25 MR. DYSART: I've lost track of

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1 how many times I've been corrected.  
2 MS. LaVALLE: I'm coming to your  
3 defense.  
4 MR. DYSART: I appreciate that.  
5 Thank you, AT&T.  
6 MR. SRINIVASA: Mr. Dysart, this  
7 measurement is neither Tier 1 nor Tier 2.  
8 MR. DYSART: Well, this wouldn't  
9 be one that I would fall on my sword for, let's  
10 put it that way, but I still think the point  
11 is -- and we'll talk about this I think as we go  
12 to some of these other issues but --  
13 MS. MURRAY: One other point, just  
14 to make sure it's clear on the record, is that  
15 the manual tracking that's being proposed here  
16 is a manual effort on our part as well, and it's  
17 extremely intensive. So in terms of kind of  
18 measuring the performance of electronic  
19 interfaces, which is where we've been up until  
20 now, we think the measurement as proposed does  
21 that, but measuring manual rejects to report to  
22 the manual CLEC their own reject information,  
23 which they are getting, is not something that  
24 we're agreeable to doing and assembling on a  
25 percentage basis.

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1 MR. SRINIVASA: Let me understand  
2 this. For all data CLECs, do they have the  
3 electronic interface available to order today?  
4 MS. CHAPMAN: Yes.  
5 MR. SRINIVASA: Because it's their  
6 own option to use the manual process.  
7 MS. MURRAY: That's correct.  
8 MR. SRINIVASA: Is that correct?  
9 You do have an electronic interface available to  
10 place your orders. It is your own option to use  
11 the manual process to place orders.  
12 MS. GENTRY: Let me say it a  
13 little bit different. This is Jo Gentry, IP  
14 Communications. In the development process of a  
15 CLEC getting into business, you kind of take it  
16 a step at a time, and so I would say when you  
17 first launch into a state, you're manual just by  
18 the need of that. Southwestern Bell may have  
19 interfaces available to me, and I'm working to  
20 be able to meet those interfaces, but in an  
21 interim period of time, which is a ramp-up  
22 period of time, I'm not able to do that.  
23 Now, if you say that's because I'm a  
24 small start-up, I understand that. Some of that  
25 is my responsibility. All I'm asking is the

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1 capturing of the data for a period of time while  
2 we're all getting into the industry.  
3 MS. DILLARD: This is Maria  
4 Dillard, and based on that, we are certainly  
5 willing to work with any CLEC that comes to us  
6 and says, "You know, can we talk about it, have  
7 conference calls and talk about the types of  
8 rejects that we're receiving at this point in  
9 time." It just really is very manually  
10 intensive, and so we're very willing to work  
11 with IP Communications or any other CLEC to walk  
12 them through any types of rejects that they're  
13 receiving to assist them getting into business.  
14 MR. SRINIVASA: Let me understand  
15 this. That means that you do not want to  
16 capture this data on a montly basis and report  
17 them on a Web site and provide that as a routine  
18 for the manual, but you're willing to work with  
19 them if they want to find out what the reject  
20 rates are?  
21 MS. DILLARD: That's correct.  
22 MS. GENTRY: IP Communications, Jo  
23 Gentry. I still believe it needs to be in the  
24 whole of the data. I think that's  
25 representative of what's going on in the

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1 industry. We certainly will take them up on  
2 their offer to continuously talk about issues,  
3 but I think it's more representative if you have  
4 all of that data in the matrix.  
5 MR. SRINIVASA: Okay. Are you  
6 familiar with the data collection process for  
7 this measure?  
8 MS. GENTRY: Generally.  
9 MR. SRINIVASA: So you're in  
10 agreement for a manual process, the collection  
11 has to be manual, too, whereas for an  
12 electronic, the data is captured electronically.  
13 MS. GENTRY: I'm not personally  
14 familiar with how they're going to capture the  
15 data.  
16 MS. YEE: Grace Yee, AT&T. I just  
17 want a clarification. If we do capture the data  
18 manually, is Southwestern Bell agreeing to  
19 disaggregate it manually versus electronically?  
20 MS. MURRAY: We're not agreeing to  
21 collect it manually.  
22 MS. YEE: I'm sorry?  
23 MR. SRINIVASA: Well, did you say  
24 the CLECs are going to collect that manually?  
25 MS. YEE: No, no, is Southwestern

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1 Bell?  
2 MS. LaVALLE: This is Kathleen  
3 LaValle. For electronically submitted orders, I  
4 think Grace's question went to is Southwestern  
5 Bell agreeable to at least capture the ones that  
6 are faxed back as a disaggregation on PM 9 if  
7 this is an electronically submitted order.  
8 MR. DYSART: All right. This is  
9 Randy Dysart, Southwestern Bell. It's my  
10 understanding that once it's submitted  
11 electronically, everything goes back LASR GUI.  
12 We don't fax anything back.  
13 MS. EGGEN: That's correct.  
14 MS. LOPEZ: This is Ann Lopez from  
15 Rhythms, and that was our understanding as well.  
16 However, we do get those outliers that come back  
17 to us faxed back.  
18 MS. DILLARD: And, Ann, this is  
19 Marie Dillard again, Southwestern Bell. I'm not  
20 aware of that, but if you're receiving those, we  
21 need to know because it may have been you may  
22 still be sending in faxed orders, and if you do  
23 send a manual-faxed order, you will receive a  
24 faxed reject back, but everything coming in  
25 electronically is sent back via LASR GUI which

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1 is an electronic return.  
2 MR. SRINIVASA: What does 10.1  
3 capture, Mr. Dysart, then? If the order is sent  
4 electronically, but there's a human  
5 intervention, either GUI or through a fax, as  
6 long as you have a human intervention, isn't  
7 that captured in 10.1?

8 MR. DYSART: Yes, 10.1 captures  
9 those things we received electronically and we  
10 returned. When I say manually, it's through  
11 LASR GUI and if we would do -- return a fax  
12 that was submitted electronically --

13 MR. SRINIVASA: Or send LASR GUI  
14 back because it fell out of --

15 MR. DYSART: Well, right. LASR  
16 GUI is definitely -- that's where we pull the  
17 information from, and, I mean, if we have some  
18 information that shows that we have actually  
19 been faxing some of these back, then we need to  
20 see that, and we can always potentially take a  
21 look at that.

22 MS. LOPEZ: This is Ann Lopez from  
23 Rhythms, and we have provided that information  
24 back. So that's something that's an ongoing  
25 work effort with us because that is our

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1 understanding, that if we provide it to you LEX.  
2 we get a reply back in LEX.

3 MS. DILLARD: And, Ann, again,  
4 Maria Dillard, Southwestern Bell. I apologize.  
5 I'm not aware of that situation, and certainly I  
6 can take that back and make sure that whatever  
7 you've submitted, we'll make sure we respond  
8 back to you, but, again, we would not be faxing  
9 back anything unless an order came in via fax,  
10 and I think Rhythms was doing both for a short  
11 period of time.

12 MS. LOPEZ: Rhythms was doing  
13 both, and when we started using LEX is when we  
14 were still getting the faxes back. We still do  
15 get faxes back to us now and then. I mean, it  
16 happens. I don't know what else to say other  
17 than it still happens.

18 MS. DILLARD: We have no  
19 problem -- again, Maria Dillard, Southwestern  
20 Bell. We have no problem with working with  
21 individual CLECs in making sure we get the  
22 process outlined correctly if there's anything  
23 being missed.

24 MS. LOPEZ: That's perfect.

25 MR. SRINIVASA: Okay.

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1 MS. EGGEN: This is Mary Ann  
2 Eggen. I'd like to state one more thing in  
3 addition to that. On the manually submitted  
4 orders, as a CLEC in start-up, I would think  
5 that it would be to your benefit to track those  
6 rejects that you do receive back in an effort to  
7 better your processes if that is the need that  
8 you have.

9 We've always welcomed the CLECs to meet  
10 with us, either via conference call or face to  
11 face. As a matter of fact, we've had numerous  
12 conference calls with our CLECs, and AT&T, MCI  
13 and Sprint in particular we've had five  
14 face-to-face meetings in the past four months,  
15 specifically to talk about rejects. So that is  
16 a vehicle that you're welcome to utilize in  
17 contacting the LSC in setting those types of  
18 meetings up.

19 MS. CHAMBERS: This is Julie  
20 Chambers with AT&T. Just one reason to actually  
21 capture this data as part of a performance  
22 measures rather than just trending data is we  
23 just realized in conversations with Southwestern  
24 Bell in mid March that the trending data that  
25 has been I guess presented on the Web site for

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1 the past, gosh, year, year and a half has not  
2 been accurate data, and, in fact, provides no  
3 use in really looking at your own, you know,  
4 trends of rejects, and so although I do think  
5 they're open to conversations and we've had  
6 conversations, I think if you really want to  
7 look at the data that it should be captured as a  
8 performance measurement.

9 MS. NELSON: What is your basis  
10 for saying the trending data is not accurate?

11 MS. CHAMBERS: Southwestern Bell  
12 actually -- I mean, we looked -- the reports  
13 that were on the Web site were not labeled  
14 accurately.

15 MS. SALAS: I can -- this is Angie  
16 Salas with Southwestern Bell. I can talk to  
17 that issue. We did have conference calls with  
18 Grace Yee and Sarah DeYoung specifically talking  
19 about AT&T's rejects on the Web. We did  
20 identify some issues jointly. Those issues have  
21 been corrected.

22 AT&T was unaware that they were still  
23 submitting manual orders. We identified that  
24 they were indeed. That issue has been  
25 corrected, and the data that's out there is



<p style="text-align: right;">Page 161</p> <p>1 valid today.</p> <p>2 MR. SRINIVASA: Let me ask, if</p> <p>3 you're sending manual orders and you know how</p> <p>4 many they're rejecting, can't CLECs collect</p> <p>5 their own data for manual if there are only a</p> <p>6 few manual orders sent? And you know how many</p> <p>7 are rejected.</p> <p>8 MS. GENTRY: Jo Gentry, IP</p> <p>9 Communications. I guess "few" would be</p> <p>10 relative. At this point, sir, it's not just</p> <p>11 five or ten because getting into business we're</p> <p>12 submitting dozens, especially as you turn up</p> <p>13 more central offices. So it does become a</p> <p>14 volume situation. We certainly do look at our</p> <p>15 own data, but, again, I was just trying to have</p> <p>16 a vehicle -- a performance measurement that</p> <p>17 encompassed all orders that came through.</p> <p>18 MR. SRINIVASA: So you know part</p> <p>19 of the six-month review process for performance</p> <p>20 measures is to reduce the number of measures,</p> <p>21 and, you know, to the extent that there's an</p> <p>22 electronic interface available and if on your</p> <p>23 own option you chose to use the manual orders</p> <p>24 and you have the capability to collect that, how</p> <p>25 many were rejected? Again, this is not a Tier 1</p>	<p style="text-align: right;">Page 163</p> <p>1 additional performance measurements to track</p> <p>2 this one thing.</p> <p>3 All we can do is provide you with our</p> <p>4 best proposal at the time, and because unlike</p> <p>5 most of the carriers that have been involved,</p> <p>6 they've been involved in this process for two</p> <p>7 and a half years, and so has Your Honor. We</p> <p>8 haven't been part of that process, and so to the</p> <p>9 extent that we've made suggestions that perhaps</p> <p>10 have already been discussed or have been decided</p> <p>11 or are antiquated, you know, all we can do is</p> <p>12 give you our best proposal based on information,</p> <p>13 and at times, it's very limited based on what we</p> <p>14 have.</p> <p>15 MS. NELSON: Okay. Well, I don't</p> <p>16 think we're going to debate whether or not -- I</p> <p>17 think at various times some of the DLECs have</p> <p>18 been involved in the 271 collaborative sessions</p> <p>19 because I think --</p> <p>20 MS. MUDGE: Not on performance</p> <p>21 measurements, Judge Nelson.</p> <p>22 MS. NELSON: Okay. Well, anyway.</p> <p>23 You certainly weren't excluded from the</p> <p>24 performance measurements is all --</p> <p>25 MS. MUDGE: No, ma'am.</p>
<p style="text-align: right;">Page 162</p> <p>1 or Tier 2. This is a diagnostic measure, and if</p> <p>2 you find that numerous rejects were received</p> <p>3 because of Southwestern Bell-caused errors,</p> <p>4 maybe at the six-month review, that's when you</p> <p>5 need to bring that up probably rather than</p> <p>6 adding more measures. If the goal is to reduce</p> <p>7 the number of PMS, it's not serving their</p> <p>8 objective.</p> <p>9 MS. MUDGE: Well, Judge Srinivasa,</p> <p>10 with all due respect, I understand that that was</p> <p>11 a goal that was stated by the Chairman two weeks</p> <p>12 ago, but I also say that with respect to DSL,</p> <p>13 this is our first opportunity -- this process,</p> <p>14 either right before the six-month review and of</p> <p>15 course now it's being held in conjunction with</p> <p>16 the six-month review, this is really our first</p> <p>17 opportunity to suggest areas in which we would</p> <p>18 like to see performance measurements that will</p> <p>19 measure information and data with respect to the</p> <p>20 entire process. So I can appreciate the stated</p> <p>21 goal of attempting to reduce, and we didn't</p> <p>22 believe that by simply adding one little thing,</p> <p>23 what we believed -- three words, and granted</p> <p>24 there's apparently a lot of work to be done, but</p> <p>25 it's not like we asked for five or six</p>	<p style="text-align: right;">Page 164</p> <p>1 MS. NELSON: -- the point I'm</p> <p>2 raising.</p> <p>3 I see Covad has a proposed 9.1. Can we</p> <p>4 discuss that, and does it differ really from the</p> <p>5 other?</p> <p>6 MS. MUDGE: Quite frankly, Your</p> <p>7 Honor, I would recommend that this is one --</p> <p>8 actually, it is a Rhythms/Covad proposal, and</p> <p>9 this is one where to the extent we're going to</p> <p>10 have another DSL, even a half day, that would be</p> <p>11 my suggestion because I really don't want to tie</p> <p>12 up the remainder of the discussion with these</p> <p>13 other CLECs here.</p> <p>14 MS. NELSON: Okay.</p> <p>15 MS. MUDGE: Thank you.</p> <p>16 MS. NELSON: Okay. Are you ready</p> <p>17 to move on then to 10.1?</p> <p>18 MR. SRINIVASA: Is there any</p> <p>19 change for PM 10?</p> <p>20 MS. KETTLER: Will you come back</p> <p>21 to the other 9.1 submitted by Birch?</p> <p>22 MS. NELSON: Sorry.</p> <p>23 MS. KETTLER: Actually, I think</p> <p>24 there was more than one 9.1. There could have</p> <p>25 been a 9.1.1 or a spam.</p>

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1 MS. NELSON: Okay. I'm not --  
2 okay.  
3 MS. KETTLER: It's on Page 32 of  
4 the combined matrix.  
5 MS. NELSON: All right. I see  
6 that, but she said there was 9.1. I was trying  
7 to see what the other one --  
8 MS. KETTLER: MCI had a 9.1.  
9 MS. NELSON: Right, but it says  
10 they concur with AT&T's suggested changes. So  
11 I'm not too sure what their proposal for 9.1 is.  
12 MS. KETTLER: Oh.  
13 MS. NELSON: I don't see an  
14 AT&T-proposed 9.1 on there.  
15 MR. SRINIVASA: So MCI concurs.  
16 There isn't any then.  
17 (Laughter)  
18 MS. EMCH: This is Marsha. I was  
19 just trying to say that it was Southwestern  
20 Bell's proposal for changes to 9, and then Birch  
21 had one for 9.1. MCI WorldCom does not have any  
22 proposed changes for 9.1.  
23 MS. NELSON: Okay. So, Birch, if  
24 you would outline your change for 9.1 or the  
25 addition of a new 9.1.

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1 MR. SAUDER: This is T.J. Sauder  
2 with Birch Telecom. We proposed 9.1 to measure  
3 number of rejects that are caught up front by  
4 the LASR system. We included some numbers there  
5 that suggest that 35 percent of our rejects are  
6 not caught up front by the LASR system, and take  
7 up to five hours that the LSC has to return it  
8 back to us.  
9 MR. DYSART: This is Randy Dysart,  
10 Southwestern Bell. Do you submit orders  
11 electronically?  
12 MR. SAUDER: Yes.  
13 MR. DYSART: Those would then be  
14 captured in PM 9 already because you have either  
15 LASR returns them, or if they fall out for  
16 manual handling in the LSC, they're returned via  
17 LASR GUI. So those both are picked up in PM 9  
18 currently.  
19 MR. SRINIVASA: Are you receiving  
20 the reports for PM 9?  
21 MR. SAUDER: Yes. Performance  
22 Measurement No. 10 captures --  
23 MR. DYSART: PM 10 captures simply  
24 the electronic, I believe, and then PM 10.1  
25 captures the electronic that are returned via

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1 LASR GUI.  
2 MS. NELSON: So I guess my  
3 question would be, are you stating that you've  
4 reviewed the PM data for Performance Measure 9  
5 for Birch and you think it's inaccurate?  
6 MR. SAUDER: I'm not saying the  
7 data is inaccurate. I think an additional  
8 measure could be used to measure how many of our  
9 rejects are caught up front by the LASR system  
10 before they fall out to manual LSC handling to  
11 determine the reject or not.  
12 MR. SRINIVASA: That will be --  
13 PM 9 is electronically generated orders and  
14 electronically rejected. Electronically  
15 rejected means it's a reject from LASR.  
16 MR. SAUDER: Right.  
17 MR. SRINIVASA: Okay. So to the  
18 extent you're reviewing the PM 9 data specific  
19 to your company -- and it has to have a  
20 denominator where the denominator is how many  
21 orders you sent electronic, it's got to be a  
22 numerator which says how many were rejected  
23 electronically, then you have that information  
24 for all electronic, but to the extent -- if you  
25 send an electronic order and if it fell out and

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1 then they sent you a LASR GUI back manual,  
2 that's captured in 10.1, again, how many were  
3 sent within five hours.  
4 MR. SAUDER: Right. What we're  
5 trying to measure is see how many of our  
6 CLEC-caused errors are caught up front by the  
7 LASR system that are returned within one hour  
8 versus how many --  
9 MR. SRINIVASA: Oh, you're trying  
10 to see the duration of that.  
11 MR. SAUDER: Well, I'm trying to  
12 measure our errors that are caught by the LASR  
13 system that were returned within one hour as  
14 opposed to the percentage total rejects that are  
15 handled manually by the LSC that are returned.  
16 MS. KETTLER: I think the  
17 overriding objective is here -- and I think  
18 Southwestern Bell -- this is Patty Kettler with  
19 Birch Telecom -- would share in this is a desire  
20 that we try to capture as large a percentage as  
21 possible of our rejects, be they -- maybe it's a  
22 function of the system, in this case, most  
23 likely they're CLEC rejects, rather than  
24 allowing them to fall out to the LSC and have  
25 manual intervention where a human can make a

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1 mistake, and we can spend five hours waiting for  
2 that reject to come back. It's just not an  
3 efficient methodology. You want to automate  
4 wherever possible, and our desire is to set this  
5 forth as a diagnostic measure with the belief --  
6 with this theory in mind that in six months we  
7 would be able to implement it with remedies,  
8 with the desire to push automation, in getting  
9 automated edits, less labor-intensive and  
10 error-prone editing at the LSC.

11 MR. SRINTVASA: Well --

12 MS. NELSON: Mr. Cowlshaw?

13 MR. COWLISHAW: Just from what  
14 little I think about this issue, from the AT&T  
15 standpoint, I think what the suggestion may be  
16 is, as we've talked about today, PM 9 percent  
17 rejects is capturing electronic LASR rejects.  
18 It's also capturing now the rejects that are in  
19 10.1. Both of those kinds of rejects are in the  
20 total in 9 now and are being captured in that  
21 percent rejects.

22 If we look over at 10.1, we can see the  
23 number of rejects that our orders fall out  
24 manually and get returned over the LASR GUI, but  
25 10.1 is a duration measure. Its percent return

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1 within five hours. There isn't a kind of  
2 percent LASR GUI reject for the 10.1 universe  
3 that just gives you what percent of a CLEC's  
4 orders are getting those kinds 10.1 rejects.

5 The numbers are all in one of the two  
6 measures, and if you work your way through the  
7 data, you can figure out, at least on an  
8 aggregate interface basis, what my percent of  
9 orders that were rejected for these LASR GUI  
10 type, later in the process manual rejects. And  
11 so the issue is, is it a useful-enough piece of  
12 information to ask that there be a separate  
13 percent LASR GUI reject measure?

14 MS. NELSON: Does Southwestern  
15 Bell want to respond to that?

16 MR. DYSART: Yes, this is Randy  
17 Dysart. Since I do the publishing of the data,  
18 I'm really concerned about adding measurements  
19 because everyone I had -- I know the comment was  
20 made "We're just asking for one little thing,"  
21 but lots of one little things add up to a whole  
22 bunch of new measurements, and I think if we're  
23 going to add any measurements, which there's  
24 probably some areas that we need to as we  
25 discussed in the DSL, we don't want to add up,

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1 create new measurements where -- the data is  
2 there. If you want that information, the data  
3 is there that you can do your own calculation,  
4 the percentage of your rejects that are LASR GUI  
5 versus LASR. That information is all contained  
6 there. I don't believe it adds a significant  
7 piece of information to the whole process that  
8 you don't have access to and can't manipulate  
9 yourself. So I would be opposed to that.

10 MS. KETTLER: We would certainly  
11 concur with that, Randy. This is Patty Kettler  
12 with Birch Telecom. The point is broader in  
13 terms of business needs. It's broader based.  
14 The intent, as I mentioned, would be -- and I  
15 think it would be to Southwestern Bell's benefit  
16 as well as our own. Neither one of us want to  
17 be in a labor-intensive, manual, error-prone  
18 environment.

19 We would prefer to be more automated.  
20 It will save costs on your side, save costs on  
21 our side and reduce errors, and so the desire  
22 would be in the long run by adding this that it  
23 would become an actual remedy-based benchmark  
24 because the objective would be to, again, move  
25 as many edits into LASR up front as you possibly

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1 could with the long-term implications being it  
2 makes you more efficient, it makes us more  
3 efficient because a CLEC is already a little bit  
4 on a minor disadvantage that when something  
5 happens manually, we must face two  
6 order-entry -- or two human intervention  
7 intervals or touches, if you will.

8 MR. SRINTVASA: Well, PM 10 and  
9 PM 10.1 -- PM 10 measures within one hour. If  
10 it was a LASR -- it's not a LASR GUI. Our  
11 objective is how many -- what percent were  
12 returned within one hour, and also is a  
13 benchmark established for that, and if they do  
14 not meet the benchmark, there's a Tier 1 low  
15 payment for that. These are liquidated damages.

16 The same thing is true for PM 10.1.  
17 PM 10.1 is percent manual rejects. That's,  
18 again, LASR GUI. Our benchmark here is 97  
19 percent within five hours. If they do not meet  
20 that benchmark, then there's a Tier 1 low  
21 payment for that also.

22 MR. SAUDER: This is T.J. Sauder  
23 with Birch Telecom. I think what we were trying  
24 to do is that one hour versus five hours. In  
25 business hours, it adds up trying to reduce the

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1 amount of time it takes us to submit an LSR. If  
2 it takes us two versions, if it falls out for  
3 manual handling, there's up to ten hours that  
4 can be spent by the LSC determining whether it's  
5 going to be rejected back or not.

6 As we move more of these reject notices  
7 into the LASR side so the percentage is lowered,  
8 we would be able to submit our correct versions  
9 in a quicker fashion.

10 MR. DYSART: This is Randy Dysart.  
11 I think one thing we can't lose sight of is the  
12 reason we send a reject back anyway. The reason  
13 we send a reject back is because there's an  
14 error on the LSR. We didn't fill the LSR out.  
15 So a lot of that is in your control. I would  
16 love it if we had no LASR GUI rejects. I'd love  
17 it if we had no rejects at all, but the bottom  
18 line is, it's still a measurement of how  
19 effective you-all are at transmitting LSRs error  
20 free. So to have Southwestern Bell subject to a  
21 penalty based upon your ability to input a clean  
22 LSR, I don't believe that -- we could never be  
23 agreeable to that.

24 MR. SAUDER: T.J. Sauder with  
25 Birch Telecom. I think we're trying to not

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1 necessarily measure Southwestern Bell's error on  
2 the manual. We're trying to pressure or impose  
3 to getting more of these edits, the rejects  
4 caught up front by the LASR system. There's  
5 always going to be errors.

6 MS. NELSON: I think the purpose  
7 of this review today is to draft performance  
8 measures, not to make cuts on what changes need  
9 to be made to the process in terms of OSS. So I  
10 think that would be more appropriate for change  
11 management or something other than the process  
12 today. I mean --

13 MS. KETTLER: Change management  
14 really will not address performance measurement  
15 related issues. So you do get caught in a void.

16 MS. NELSON: But it's not -- what  
17 you're telling me is you want more changes up  
18 front. Is that correct?

19 MR. SAUDER: We would like the  
20 errors to be caught up front.

21 MS. NELSON: Okay.

22 MR. SRINTVASA: Well, essentially  
23 what you're telling us is you want them to move  
24 more edits to the LASR. They're working on  
25 that. That's been discussed all through the

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1 morning, that issue.

2 MR. SAUDER: I think the proposed  
3 performance measurement would track how they're  
4 progressing. So as they're --

5 MS. KETTLER: Correct.

6 MR. SAUDER: So as more rejects  
7 are caught up front, this percentage goes down.

8 MS. NELSON: Okay. I guess -- you  
9 know, I think we have the information we need,  
10 but the purpose -- Southwestern Bell has to have  
11 an obligation to do something within a certain  
12 time frame, or we have to decide that there's an  
13 obligation, and those moving of edits up to LASR  
14 are something that's being done in change  
15 management, and it seems to me at least  
16 inappropriate to decide in this process, as part  
17 of performance measures, that we're going to  
18 require certain changes be moved up to LASR and  
19 measure it that way until there's -- because  
20 there's a process in place already, being change  
21 management, to make those decisions.

22 MR. WILLARD: Your Honor, Walt  
23 Willard with AT&T. There is nothing in the  
24 change management process that compels them to  
25 accept a suggested change. CLECs are instructed

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1 to fill out a change request, which SWBT is  
2 completely, you know, at their freedom to decide  
3 whether or not they want to do it or not. Now,  
4 oftentimes they will discuss those with the  
5 CLECs, but there's no incentive for getting them  
6 to move those edits up front to the LASR.

7 MS. LAWSON: And this is Beth  
8 Lawson with Southwestern Bell. I'd have to  
9 disagree that there's no incentive.  
10 Southwestern Bell would love to have every edit  
11 up front. It's no manual intervention. So, of  
12 course, it's a win/win for the CLEC and for  
13 Southwestern Bell to have the edits up front,  
14 and I guess if we want to talk about this issue  
15 further, we can look at how long is it taking  
16 the CLEC to return a corrected LSR to  
17 Southwestern Bell. If we want to start lurking  
18 at that side of the picture, we've got some very  
19 interesting facts on that side.

20 MS. HARTLINE: Your Honors, Rina  
21 Hartline for Birch Telecom, and I just wanted to  
22 suggest that while I understand there's some  
23 question about where the proper forum is to  
24 bring up these issues, I did want to note that  
25 performance measurements are not just used for

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1 remedy purposes, but also as a data management  
2 tool, and it's important for CLECs to be able to  
3 figure out where breakdowns are happening, and  
4 so if this would be possible, I think it would  
5 certainly be a benefit.  
6 MR. SRINIVASA: Well, if every  
7 LSR, the process, \$2.50 is what you're paying,  
8 they keep doing it manually, do you think that  
9 they'll prolong doing it? Isn't there an  
10 incentive by means of the rate itself they need  
11 to move towards automation?  
12 MS. HARTLINE: We hope there's an  
13 incentive to move towards automation, but I  
14 think the goal with suggesting this performance  
15 measurement is to give us a tool that we can all  
16 use.  
17 MS. NELSON: Right, but I guess  
18 it's -- you know, staff and the Commission --  
19 we're struggling because most of these  
20 performance measures impose requirements on  
21 Southwestern Bell to do the monitoring and not  
22 on the CLECs to do the monitoring, and I  
23 understand that's because in certain cases  
24 Southwestern Bell has the information, but in  
25 other cases like rejects, the CLECs also have

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1 information on what the cause of their reject  
2 was. So in terms of this discussion, it's  
3 important to keep that in mind, but I think we  
4 have the information we need on 9.1, and it  
5 would be worthwhile at this point to move on  
6 to 10.  
7 MS. HARTLINE: Thank you, Your  
8 Honor.  
9 MR. WILLARD: Your Honor, Walt  
10 Willard for AT&T. If I could, without  
11 belaboring the point, just note that not all  
12 rejects are CLEC-caused rejects.  
13 MS. NELSON: Right. I don't think  
14 anyone is suggesting that they are.  
15 MR. WILLARD: Mr. Dysart did.  
16 MR. DYSART: Let me clarify that  
17 as not true. If you listened to what I said, I  
18 said we never return a reject intentionally  
19 that's not -- that's a Southwestern Bell-caused  
20 reject. I'm not saying it never happens. So be  
21 very clear of how you quote me, please.  
22 MR. WILLARD: We don't  
23 intentionally take address information off of  
24 CSRs and put them into LSRs that reject so --  
25 MS. MURRAY: Could we go off the

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1 record for just a moment?  
2 MS. NELSON: Yes. We're going to  
3 go off the record for a moment.  
4 (Discussion off the record)  
5 MS. NELSON: Let's go back on the  
6 record. Okay.  
7 MR. SRINIVASA: We're going to  
8 move on to PM 10. Mr. Dysart, do you have any  
9 change for PM 10?  
10 MR. DYSART: Yes, we do. It's a  
11 couple of changes that -- we didn't hand out a  
12 PM 10, and I apologize for that.  
13 For the matrix, we want it in the  
14 business rule -- we want to change it to read  
15 "The start time used is the date and time the  
16 reject is known to LASR, and the end time is the  
17 date and time the reject notice is available to  
18 the CLEC via EDI or LEX."  
19 MR. SRINIVASA: Is provided or  
20 available?  
21 MR. DYSART: Available.  
22 MR. SRINIVASA: So strike  
23 "provided" and replace it with "available."  
24 MR. DYSART: Right.  
25 MR. SRINIVASA: Okay.

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1 MR. COWLISHAW: This is a proposal  
2 to change 10?  
3 MR. DYSART: Yes, unfortunately I  
4 don't have my copy here to know exactly what --  
5 I'm just reading the business rule as it is.  
6 MS. NELSON: It's on the matrix on  
7 Page 33.  
8 MR. COWLISHAW: Okay.  
9 MR. DYSART: It's "The start time  
10 used is the date and time the reject is known to  
11 LASR, and the end time is the date and time the  
12 reject notice is available to the CLEC, via EDI  
13 or LEX. A mechanized reject is any reject made  
14 available to the CLEC electronically without  
15 manual intervention," and then we're adding a  
16 phrase on the business rule that talks about  
17 the -- "If the CLEC accesses Southwestern Bell  
18 systems using a service bureau provider, the  
19 measurement of Southwestern Bell's performance  
20 does not include SBP processing, availability or  
21 response time." Those are more clarification  
22 issues.  
23 Then the one change we were wanting to  
24 make, and I guess I actually brought this up a  
25 little earlier. I'm sure I'll get similar

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1 reaction, but as far as how we report, we want  
2 to aggregate LEX and EDI together simply because  
3 it's based out of LASR. and that's what returns  
4 the reject.

5 MR. SRINIVASA: Today it's  
6 reported on a disaggregated basis.

7 MR. DYSART: Yes, it is.

8 MS. NELSON: Okay. Do any of the  
9 CLECs want to comment on the proposed change to  
10 the business rule language?

11 MS. LOPEZ: This is Ann Lopez from  
12 Rhythms, and we'd like to add -- to change what  
13 we have added -- included electronic message or  
14 e-mail. That's something that we do today.

15 MS. NELSON: Okay. We'll get to  
16 everyone else's suggestions in just a minute.

17 First, I wanted to see if you had comments to  
18 what Southwestern Bell was suggesting.

19 MR. WILLARD: Walt Willard with  
20 AT&T. We'll confirm Mr. Dysart's suspicion that  
21 we would not like to see this measure reported  
22 in the aggregate, but would like for it to  
23 continue to be disaggregated by interface.

24 MS. EMCH: MCI WorldCom, this is  
25 Marsha Emch. We would concur with AT&T. We use

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1 both LEX and EDI. As we're transitioning to  
2 EDI, we'd like to see them reported separately.

3 MR. SRINIVASA: Well, if that's  
4 the case, then why should damages be paid for  
5 each one? Should that be for one or the other?  
6 Say, for example --

7 MR. DYSART: Could I make a  
8 counter-proposal? What if we did -- if you just  
9 need it for diagnostic purposes, the difference,  
10 can we combine it for the purposes of -- if it's  
11 damages and assessments, combine it for damages  
12 and assessments. We'll give you both for  
13 diagnostic if that's the reason you need it, and  
14 then we would have one overall actual  
15 performance.

16 MS. CHAMBERS: This is Julie  
17 Chambers. In looking at other performance  
18 measures, I know sometimes you do see a  
19 discrepancy in the results for, say, LEX versus  
20 EDI, and yet you're saying it's the same backend  
21 processes. So I'm curious why it would matter.  
22 I mean, if it's the same backend processes,  
23 wouldn't you meet it or have about the same  
24 performance, regardless of which interface is  
25 utilized?

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1 MR. DYSART: Well -- this is Randy  
2 Dysart, Southwestern Bell. It depends on what  
3 the particular CLEC -- you have different CLECs  
4 using LEX. You have different CLECs using EDI.  
5 So I think depending upon the CLEC, I think,  
6 yes, it has something to do with that.

7 MR. WILLARD: Walt Willard with  
8 AT&T. and you have some CLECs using both.

9 MR. DYSART: True, and all I'm  
10 saying is our overall performance of the CLEC  
11 would be the combination of both, and if you  
12 need it diagnostically, the individual --  
13 because it all comes from LASR, particularly in  
14 a mechanized standpoint. You're not talking  
15 about anything handled manually in this  
16 measurement. 10 is just strictly LASR. and LASR  
17 returns the reject. LEX or EDI doesn't return  
18 the rejects. It's LASR that returns the reject.

19 MR. WILLARD: Walt Willard with  
20 AT&T. Can you help me understand when would  
21 there ever be a case of a discrepancy in  
22 performance because if all the backend systems  
23 are the same, either you've met it -- I mean, if  
24 you've met it for one category of electronic  
25 interface like EDI, the you've met it for LEX

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1 presumably.

2 MR. DYSART: Well, in the interest  
3 of trying to reduce some levels of  
4 disaggregation where we can, I mean, this is one  
5 that seemed to be one that we could do since  
6 really it's not a measurement of LEX or EDI.  
7 It's a measurement of LASR. and all you're doing  
8 here is measuring which interface it goes to,  
9 but the reject comes from LASR. It does not  
10 come from LEX. It does not come from EDI. It  
11 comes from LASR. So I think the appropriate  
12 thing to do is to measure LASR. and then if you  
13 need it for some reason disaggregated, I mean,  
14 we can tell you where it came from, but for  
15 overall performance, it's by performance of LASR  
16 that's important, not LEX or EDI.

17 MS. CHAMBERS: This is Julie  
18 Chambers. I just thought we were making it more  
19 complicated through your proposed I guess  
20 compromise in that if you can report it  
21 disaggregated and performance should be the  
22 same, then why go to the trouble of then  
23 aggregating it again?

24 MR. DYSART: Well, I would rather  
25 report it just once aggregated.

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1 MS. CHAMBERS: Right, but you're  
2 responding to our request which would be -- it  
3 is beneficial for us to see it separately.  
4 MR. SRINIVASA: Right. My  
5 understanding is for your own analysis you'd  
6 like to see them separately, what is the  
7 performance if it's through LEX, or what is the  
8 performance if it goes through LASR.  
9 My understanding is all the rejects are  
10 from the LASR. It is collected coming through.  
11 Say, for example, they missed -- if they  
12 reported it separately, there's a damage  
13 associated with that. If they missed it in EDI,  
14 they pay damage once. For the same lack of  
15 performance, again, they pay damages for LEX  
16 also.  
17 MR. COWLISHAW: It's just on that  
18 one narrow point. I mean, the mechanism for  
19 payment under the Texas remedy plan is a  
20 per-occurrence mechanism. So if you're dividing  
21 it into two universes, and it's the same  
22 performance on both, and it's the same violation  
23 on both, they're not going to pay twice.  
24 They're going to pay -- now they're going to pay  
25 half under one disaggregation and half under the

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1 other instead of paying one time under the  
2 whole. I don't think there's a double payment  
3 issue so long as the per-occurrence scheme is in  
4 effect.  
5 MR. DYSART: This is Randy Dysart.  
6 I agree with you. From that perspective, you're  
7 right, but it's important -- again, we had this  
8 conversation sometime last week. We talked  
9 about measuring the process. The process is  
10 LASR returns the reject. From a process  
11 perspective, that's what I think we should be  
12 evaluated on, our LASR performance, not  
13 whether -- which interface we ended up sending  
14 back to from LASR because it has very little to  
15 do with it. So that's my only point, is  
16 performance should be based on the process a  
17 little bit in this situation.  
18 MS. NELSON: Okay. I think we  
19 have enough information on that one. Nobody  
20 responded -- okay.  
21 MR. SRINIVASA: Also in terms of  
22 the number of K exemptions, you only count those  
23 two as one instead of two separate now.  
24 MR. COWLISHAW: I guess that's  
25 correct.

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1 MR. SRINIVASA: Right.  
2 MR. COWLISHAW: I was going to ask  
3 whether there was -- because to some extent what  
4 those different interfaces are doing now are  
5 reflecting different mixes of orders by  
6 different CLECs, and if there's a willingness or  
7 an interest on Southwestern Bell's part to  
8 disaggregate the measure rather than by EDI  
9 versus LEX, to disaggregate it by major category  
10 of order type, resale, UNE-P, UNE-L, conceivably  
11 DSL, that might be a different way to cut the  
12 information that had usefulness.  
13 MR. SRINIVASA: For diagnostic  
14 purposes?  
15 MR. COWLISHAW: And really  
16 track -- you know, where there are differences  
17 of reject problems because of different issues  
18 that arise with different order types.  
19 MR. DYSART: This is Randy Dysart.  
20 I don't believe -- we're not interested in  
21 adding multiple levels of disaggregation  
22 because, again, what we're talking about here is  
23 our ability to return a reject. There's other  
24 things on the Web site that talk about the  
25 different types of rejects that are returned,

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1 and the CLECs have that information.  
2 This is a measurement of how quickly we  
3 return a reject, regardless of whether it's for  
4 resale or UNE. It doesn't really make any  
5 difference. It's that amount of time it takes  
6 to respond to that. So a reject is a reject.  
7 MR. SRINIVASA: The process is the  
8 same, regardless of the type of order.  
9 MR. DYSART: Right.  
10 MR. SRINIVASA: Is that what  
11 you're stating?  
12 MR. DYSART: Right.  
13 MS. NELSON: Okay. I'm assuming  
14 that no one has -- is objecting to the change in  
15 the business rule language because no one has  
16 said anything about that.  
17 MS. CHAMBERS: Actually -- this is  
18 July Chambers with AT&T. I do just want to  
19 clarify first -- I mean, I think I know what  
20 you're meaning by the service bureau phrase, but  
21 would like to make sure that it's consistent.  
22 Could you clarify, Randy, what you mean by that  
23 business rule change?  
24 MR. DYSART: I can't, but I can  
25 get somebody who can.